

UNITED STATES OF AMERICA)		
. v.)	CRIMINAL NO. 1:12-CR-224	
MAURICE LEE KRIDER,)	Count 1 - 21 U.S.C. §§ 841, 846	2
GILBERTO RAMOS,)	(Conspiracy to Distribute Five Kilograms or More Cocaine)	
and)	cocame)	
CARLOS TORRES,)	Forfeiture - 21 U.S.C. § 853 (Forfeiture of Drug-Related Assets)	ıre
a.k.a. "Juan Carlos Torres,")		
Defendants.)		

SUPERSEDING INDICTMENT

AUGUST 2012 TERM - at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT 1

From in and around January 2010 through on or about August 9, 2011, within the Eastern District of Virginia and elsewhere, the defendants, MAURICE LEE KRIDER, GILBERTO RAMOS, and CARLOS TORRES did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree with others, both known and unknown to the grand jury, to unlawfully, knowingly and intentionally distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

The purpose of the conspiracy was to make money through the trafficking and distribution of cocaine in the Eastern District of Virginia and elsewhere. The ways, manner and means by which this purpose was carried out included, but was not limited to the following:

- 1. It was part of the conspiracy that members of the conspiracy shipped and caused to be shipped multi-kilogram loads of cocaine from California to locations on the East Coast of the United States using tractor-trailers with hidden compartments.
- 2. It was further part of the conspiracy that members of the conspiracy drove trucks with hidden compartments containing multi-kilogram loads of cocaine from California through the Eastern District of Virginia en route to locations in the Washington, DC metropolitan area and the New York metropolitan area.
- 3. It was further part of the conspiracy that members of the conspiracy obtained multi-kilogram loads of cocaine in the Washington D.C. metropolitan area in order to distribute that cocaine to customers.
- 4. It was further part of the conspiracy that members of the conspiracy would transport money interstate to pay for loads of cocaine.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

- 1. In and around August 2010, GILBERTO RAMOS, Tony Sandoval, Bobby Garcia, CC-1, and others, known and unknown to the grand jury, transported and caused to be transported approximately 10 kilograms of cocaine from California, through the Eastern District of Virginia, to a location in the Washington, DC metropolitan area using a tractor trailer with a hidden compartment. This cocaine was delivered to MAURICE LEE KRIDER, CARLOS TORRES Tyrone Smith, Jesus Sandoval, and others, known and unknown to the grand jury, for further distribution.
- 2. In and around September 2010, GILBERTO RAMOS, Tony Sandoval, Bobby Garcia, CC-1, and others, known and unknown to the grand jury, transported and caused to be transported approximately 12 kilograms of cocaine from California, through the Eastern District of Virginia, to a location in the Washington, DC metropolitan area using a tractor trailer with a hidden compartment. This cocaine was delivered to MAURICE LEE KRIDER, CARLOS TORRES, Tyrone Smith, Jesus Sandoval, and others, known and unknown to the grand jury, for further distribution.
- 3. In and around October 2010, GILBERTO RAMOS, Tony Sandoval, Bobby Garcia, CC-1, and others, known and unknown to the grand jury, transported and caused to be transported approximately 10 kilograms of cocaine from California, through the Eastern District of Virginia, to a location in the Washington, DC metropolitan area using a tractor trailer with a hidden compartment. This cocaine was delivered to MAURICE LEE KRIDER, CARLOS TORRES,

Tyrone Smith, Jesus Sandoval, and others, known and unknown to the grand jury, for further distribution.

- 4. On or about November 6, 2010, CC-1 drove a tractor trailer outfitted with a hidden compartment containing approximately 16 kilograms of cocaine and approximately \$400,000 in United States currency. The cocaine was a shipment from California, and the currency was proceeds from cocaine sales destined to return to GILBERTO RAMOS, Tony Sandoval, Bobby Garcia, and others known and unknown to the grand jury.
- 5. On or about October 27, 2011, approximately 2 kilograms of cocaine belonging to MAURICE KRIDER and Tyrone Smith was seized in Maryland from a vehicle belonging to Tyrone Smith.
- 6. On or about April 6, 2012, approximately 1 kilogram of cocaine was seized in Elkridge, Maryland from property belonging to CARLOS TORRES.

(All in violation of Title 21, United States Code, Section 846).

FORFEITURE

Each defendant, if convicted of Count 1 of this indictment, shall forfeit to the United States any property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violation, including, but not limited to any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation, including, but not limited to the following specific property:

MAURICE KRIDER

- 1. 2012 Range Rover, VIN # SALVV2BG9CH665085
- 2. 2008 Land Rover, VIN # SALFR24N68H067001
- 3. 2004 Lincoln Navigator, VIN # 5LMFU28RX4LJ25792
- 4. Real Property located at 9213 Winterset Court, Clinton, Maryland

GILBERTO RAMOS

- 1. Real property located at 9640 Andora Avenue, Chatsworth, California
- 2. All funds held in the name Gilberto Ramos at Lockheed Federal Credit Union, including, but not limited to, the following:
 - (A) Account No. 407089700-09
- 4. \$5,709.00 in U.S. Currency seized during a search of Gilberto Ramos' residence located in Chatsworth, California on May 16, 2012
- 5. 2007 Chevy Avalanche, VIN # 3GNEC12J27G266755

CARLOS TORRES

- 1. 2005 Suzuki GSXR-750, VIN#JS1GR7JA952104061
- 2. 2009 Range Rover LL, VIN#SALSF25439A213698
- All funds held in the name Juan Carlos Torres, Juan Torres or Carlos Torres, including, but not limited to, the following financial institutions:
 - a. Bank of America:
 - 1) Account #122000661-1080-09498-74564
 - 2) Account # 4460223022049
 - 3) Account # 4744770025671851
 - b. Chase Bank:
 - 1) Account # 431397046 Business Select Checking
 - 2) Account #958328833 Total checking
 - 3) Account #4282087106814146
 - c. Burbank Community Federal Credit Union:
 - 1) checking account #322274132:20000003799602:0177

(Pursuant to Title 21, United States Code, Section 853; and Rule 32.2(a), Federal Rules of Criminal Procedure).

A TRUHIRDIT to the E-Government Act, the original of this page has been filed under seal in the Clerk's Office.

FOREPERSON

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